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**VIA ELECTRONIC FILING**

The Honorable David Butler  
Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, South Carolina 29211

**RE: Friends of the Earth and Sierra Club v. SCE&G  
Docket No. 2017-207-E**

**Request of the Office of Regulatory Staff for Rate Relief to South  
Carolina Electric & Gas Company's Rates Pursuant to S.C. Code Ann. §  
58-27-920  
Docket No. 2017-305-E**

**Joint Application and Petition of South Carolina Electric & Gas  
Company and Dominion Energy, Incorporated for Review and Approval  
of a Proposed Business Combination between SCANA Corporation and  
Dominion Energy, Incorporated, as May Be Required, and for a  
Prudency Determination Regarding the Abandonment of the V.C.  
Summer Units 2 & 3 Project and Associated Customer Benefits and Cost  
Recovery Plans  
Docket No. 2017-370-E**

**Dear Mr. Butler:**

I am writing on behalf of South Carolina Electric & Gas Company in response to the request of the South Carolina Office of Regulatory Staff ("ORS") that it be allowed to play portions of Carlette Walker's and Ken Browne's video depositions during in the hearing in the above-referenced dockets. We object to this request on several grounds. First, ORS represented to the Public Service Commission of South Carolina ("Commission") that ORS would present these witnesses live, only to have ORS announce on the morning of the first day of the hearing that in fact they were not bringing those witnesses to the hearing. In an effort to accommodate the ORS with respect to Ms. Walker's and Ken Browne's "unavailability," we agreed to a stipulation to enter their deposition transcripts in the record without redactions. No mention was made by ORS in negotiating or entering the stipulation that any portion of Ms. Walker's or Mr. Browne's deposition would be played by video, and if ORS had raised that issue when the stipulation was agreed upon, then we would have objected. The Commission will recall that Mr. Richardson first mentioned video clips on the first day of the hearing and Mr. Balser immediately objected. Second, if the

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Commission permits ORS to play snippets of Ms. Walker's and Mr. Browne's video in the hearing, then we will have no choice but to designate significant portions of their depositions to play as cross-examination. This will waste many hours of valuable hearing time watching excerpts of video testimony of witnesses whose entire transcripts already are available for the Commission, the parties, and the public to read without redaction. ORS should either bring the witnesses to the hearing or rely on their written deposition transcripts. ORS should not be permitted to have their cake and to eat it too by reversing themselves on bringing in the witnesses they told the Commission they would bring and then requiring the Commission to take up valuable hearing time passively watching direct examination and cross-examination video of those witnesses.

**If you have any questions, please advise.**

**Very truly yours,**



**K. Chad Burgess**

**KCB/kms**

**cc: All parties of Record in Docket No. 2017-305-E  
All parties of Record in Docket No. 2017-207-E  
All parties of Record in Docket No. 2017-370-E  
(all via electronic mail only)**